

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
Brett Karson)	No. 09-48999
Melinda Karson)	
)	Judge Wedoff
Debtor(s))	
)	Chapter 13
)	

NOTICE OF MOTION

TO: Shellpoint Mortgage Servicing, PO Box 10826, Greenville SC 29603
Melinda Karson, 2810 Woodmere Drive, Northbrook IL 60062
Marilyn Marshall, 224 S Michigan Ave, 8th Floor, Chicago IL 60604

PLEASE TAKE NOTICE that on May 21, 2015 at 9:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Wedoff, or any other judge sitting in his stead, in the courtroom usually occupied by him in Courtroom 744 of the Dirksen Federal Building, 219 S Dearborn Street, Chicago Illinois 60604, and then and there move for entry of an order in accordance with the prayer of the motion attached hereto, at which time and place you may appear if you so desire.

/s/ Edwin L Feld

CERTIFICATION

I, Edwin L Feld, the attorney in the above captioned case, state that I served the above notice and motion upon the above named parties, via United States Mail, properly addressed with postage fully prepaid before the hour of 4:30 pm, at 29 S. LaSalle, Chicago, Illinois, on April 29, 2015.

/s/ Edwin L Feld

Edwin L Feld
Edwin L Feld & Associates, LLC
29 S. LaSalle, Suite 328
Chicago, IL 60603
(312) 263-2100

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MOTION TO DETERMINE FINAL CURE AND PAYMENT

NOW COME the Debtors herein, Brett Karson and Melinda Karson, by and through their attorneys, Edwin Feld, and Edwin L Feld & Associates, LLC and pursuant to Bankruptcy Rule 3002.1 and respectfully request that this Honorable Court hold a hearing to Determine Final Cure and Payment, and in support of this motion, state as follows:

1. The above-referenced case was filed on December 29, 2009.
2. The Chapter 13 Plan was confirmed on February 18, 2010.
3. On March 23, 2015 the Chapter 13 Trustee filed their Notice of Final Cure Mortgage Payment required by Bankruptcy Rule 3002.1
4. On April 9, 2015 Shellpoint Mortgage Servicing filed their Response to Notice of Final Cure Payment required by Bankruptcy Rule 3002.1
5. The Response to Notice of Final Cure Payment states that the Debtors have post-petition arrears in the amount of \$40,591.37.
6. Debtor disputes that there are any arrears on the Mortgage and requests this court hold a hearing to determine whether the debtor has paid all post-petition amounts.

WHEREFORE, pursuant Bankruptcy Rule 3002.1 hold a hearing to determine if all required post-petition mortgage payments were made and further relief that this Court deems appropriate.

Respectfully Submitted,

/s/ Edwin L Feld
Attorney for Debtors

Edwin L Feld
Edwin L Feld & Associates, LLC
29 S. LaSalle, Suite 328
Chicago, IL 60603
(312) 263-2100